

JUROR # _____

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
MARK I. SOKOLOW, et al.,

Plaintiffs,

Jury Questionnaire

04 Civ. 397 (GBD)

-against-

THE PALESTINE LIBERATION
ORGANIZATION, THE PALESTINIAN
AUTHORITY, et al.,

Defendants.

-----X

HON. GEORGE B. DANIELS
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
500 PEARL STREET
NEW YORK, NY 10007

1. What is your age: _____

2. Are you: ☐ Male ☐ Female

3. In what city, state and country were you born and raised?

Born: _____

Raised: _____

Raised (2): _____

4. If born outside the United States, are you a naturalized citizen? ☐ Yes ☐ No

5. If born outside of the United States, how long have you lived in the United States?

6. Where were your parents born?

Father: _____ Mother: _____

7. What county do you currently live in?

County (e.g., Manhattan, Bronx, Westchester, Rockland, etc.): _____

(a) How long have you lived at your present address? _____

(b) With whom do you live? _____

(c) In what other areas, states, cities, or neighborhoods have you lived in the past 15 years?

8. What is your marital status:

☐ Single

- ☐ Single, living with another person as a couple
☐ Single, living with a roommate(s)
☐ Married
☐ Divorced/Separated
☐ Widowed

9. Do you have any children, stepchildren or grandchildren:

☐ Yes ☐ No

If yes, please indicate the following for each child, stepchild and grandchild (*please do not list the person's name*):

Age	M/F	Highest Education	Current Occupation	Lives with you?

10. What is your highest level of education?

- ☐ less than high school (grade)
☐ high school/GED degree
☐ two-year college degree
☐ four-year college degree
☐ some community/technical/business school
☐ post college graduate studies
☐ graduate school degree
☐ other:

Please list your major areas of study or area of concentration and any degrees or certificates, licenses, etc. that you have received.

11. If you are married or living with someone, what is that person's highest level of education and area of study? _____

12. What is your employment status?

(Please check all that apply)

Employed:	<input type="checkbox"/> full-time	<input type="checkbox"/> part-time	<input type="checkbox"/> have more than one job
Unemployed	<input type="checkbox"/> laid-off	<input type="checkbox"/> looking for work	<input type="checkbox"/> not looking for work
Other	<input type="checkbox"/> homemaker	<input type="checkbox"/> retired	<input type="checkbox"/> disabled
Student	<input type="checkbox"/> full-time	<input type="checkbox"/> part-time	Studying: _____

13. What is your current occupation or most recent occupation-in other words, what type of work do you do and, if not currently working, what type of work were you doing previously?

(a) What is your current job title and duties? _____

(b) How long have you been in your present job? _____

(c) Are you self-employed or do you work for others? _____

(d) If self-employed, what type of business is it? _____

(e) Check the following category that best describes your employer:

- ☐ Private, for profit organization
- ☐ Private, not for profit organization
- ☐ Federal government agency
- ☐ Other: _____
- ☐ State government agency
- ☐ County government agency
- ☐ City or local government

(f) Have you supervised others? ☐ Yes ☐ No

If yes, please describe what supervisory or management positions you held, the type of supervising and the number of people supervised.

(g) Have you ever owned your own business? ☐ Yes ☐ No

If yes, what type of business was it? _____

14. If you are married or living with someone, what is that person's employment status and what type of work does he or she do? (If he or she is not working now, please indicate the type of prior work done.)

15. Have you ever served in the military including the Reserves, National Guard or ROTC?

☐ Yes ☐ No

If yes, what was the branch and rank? _____

16. Has one of your family members or a member of your household ever served in the military including the Reserves, National Guard or ROTC? *(Please do not list names)*

☐ Yes ☐ No

If yes, what was that person's relationship to you? _____

If yes, what was the branch and rank? _____

(a) Have you, a family member or a member of your household ever served in a combat or military zone?

☐ Yes ☐ No

If yes, where and when? _____

What was that person's relationship to you? _____

(b) Did you ever serve in the Military Police or on a Court Martial?

☐ Yes ☐ No

If yes, where and when? _____

17. Have you ever served in the military of another country?

If yes, in which country's military did you serve? _____

18. Has your family member or a member of your household ever served in the military of another country?

If yes, what is that person's relationship to you? _____

If yes, in which country's military did that person serve? _____

19. Have you, a family member or a member of your household ever worked for any law enforcement agency such as the police department, a prosecutor's office or any other federal, state or local law enforcement agency?

☐ Yes ☐ No

If yes, please explain:

20. Have you previously traveled outside the United States? If yes, please describe where and approximately when?

☐ Yes ☐ No

If yes, please describe where and approximately when:

21. Do you, a family member or a member of your household own a licensed firearm(s)?

☐ Yes ☐ No

If yes, state how many and what type, and reason for ownership:

22. Do you have experience using firearms?

☐ Yes ☐ No

If yes, what type and for what purpose:

23. Do you or does anyone in your household have any experience with explosives?

☐ Yes ☐ No

If yes, please explain:

24. What community, civic, social, union, professional, **religious**, fraternal, political, or recreational organizations do you belong to?

(a) Have you held any offices or positions of leadership in any such organization?

☐ Yes ☐ No

If yes, please describe:

25. What community, civic, social, union, professional, **religious**, fraternal, political or recreational organizations does your spouse or significant other belong to and what leadership positions, if any, has he or she held?

26. What are your hobbies/interests? What do you like to do in your spare time?

27. What television shows do you watch most often?

28. What magazines, journals or websites do you read most often?

29. What newspapers do you read most often?

30. What kind of books do you read most often?

31. What television news programs, radio programs, or internet websites do you watch, listen to, or visit on a regular basis?

32. What radio programs do you listen to most often?

33. What are your primary sources of local, national, and international news?

34. Have you ever served on a jury before?

☐ Yes, at trial ☐ Yes, for a grand jury ☐ No

(a) If you served as a juror for a trial, was it a civil or criminal case?

☐ Civil - Number of trials _____

☐ Criminal – Number of trials _____

(b) If you served as a juror for trial(s), without indicating the result, did you deliberate with the other jurors and reach a verdict?

☐ Yes ☐ No

Please explain: _____

35. Have you, a family member or a member of your household ever been a victim of or witness to a crime, whether or not the crime was reported to law enforcement?

☐ Yes ☐ No

If yes, please explain:

36. Have you ever appeared or testified in any legal proceeding or investigation for any reason, whether as a plaintiff, defendant, victim, or witness?

☐ Yes ☐ No

If yes, please explain:

37. Have you, a family member or a member of your household ever sued anyone?

☐ Yes ☐ No

If it was your family/household member, what is his/her relationship to you: _____

Please explain, including nature and outcome of the case

Were you/they satisfied with the outcome?

☐ Yes ☐ No

38. Have you, a family member or a member of your household ever been sued by anyone?

☐ Yes ☐ No

If it was your family/household member, what is his/her relationship to you: _____

Please explain, including nature and outcome of the case

Were you/they satisfied with the outcome?

☐ Yes ☐ No

39. Have you, a family member or a member of your household ever been arrested, convicted

or accused of a crime?

Yes (self) _____ Yes (family/friend) _____ No _____

If yes, *without mentioning names*, please generally describe the circumstances and your relationship(s) to the person(s) involved:

40. Please indicate if you know or have heard of any of the following individuals who are the lawyers representing the parties in this case:

Plaintiffs' Attorneys and Staff:

Arnold & Porter LLP:

Ken L. Hashimoto
Philip W. Horton
Michael Kientzle
Tal R. Machnes
Lucy S. McMillan
Sara K. Pildis
Carmela T. Romeo
Kent A. Yalowitz

☐ Yes ☐ No

Law Offices of Nitsana Darshan-Leitner:

Nitsana Darshan-Leitner
Mordechai Haller
Avi Leitner
Dina Rovner
Rachel M. Weiser

☐ Yes ☐ No

The Berkman Law Office, LLC:

Robert J. Tolchin

☐ Yes ☐ No

Defense Attorneys and Staff:

Miller & Chevalier Chartered:

Laura G. Ferguson

Richard A. Hibey

Brian A. Hill

Lamia Rita Matta

Dawn E. Murphy-Johnson

Timothy P. O'Toole

Matthew T. Reinhart

Mark J. Rochon

Michael Satin

Andrew Todd Wise

☐ Yes ☐ No

If yes, please indicate who you know or have heard of and what you know or have heard:

41. Please indicate if you know or have heard of any of the following individuals who are each plaintiffs in this case:

Katherine Baker

Alan J. Bauer

Binyamin Bauer

Daniel Bauer

Yehonathon Bauer

Yehuda Bauer

Rebekah Blutstein

Richard Blutstein

Larry Carter

Shaun Coffel

Robert L. Coulter, Sr

Robert L. Coulter, Jr

Dianne Coulter Miller

Chana Bracha Goldberg

Eliezer Simcha Goldberg

Esther Zahava Goldberg

Karen Goldberg

Shoshana Maika Goldberg

Tzvi Yehoshua Goldberg
Yaakov Moshe Goldberg
Yitzhak Shalom Goldberg
Elise Janet Gould
Ronald Allan Gould
Shayna Eileen Gould
Nevenka Gritz Oz
Joseph Guetta
Leonard Mandelkorn
Henna Novack Waldman
Jessica Rine
Elana R. Sokolow
Jamie A. Sokolow
Lauren M. Sokolow
Mark I. Sokolow
Rena M. Sokolow
Morris Waldman
Shmuel Waldman

☐ Yes ☐ No

If yes, please indicate who you know or have heard of and what you know or have heard:

42. The defendants in this case are the Palestine Liberation Organization (PLO) and Palestinian Authority (PA). How knowledgeable are you about these two entities?

☐ Not at all

☐ A little/somewhat

☐ A lot/very

Please explain:

42a. Do you believe that your knowledge or feelings about the PLO or the PA could affect your ability to be fair and impartial in this trial?

☐ Yes

☐ No

☐ I have no knowledge of the PLO or PA

If yes, please explain:

43. Among the witnesses who may be called in this case, or individuals about whom you may hear testimony, are the people listed in Attachment A. I caution you that just because a person's name appears on Attachment A imposes no burden on either side to call that person as a witness. If you think you know one (or more) of these people, please include below the person's name and how you think you know him or her.

43a. In addition to the possible witnesses who may be called in this case, you may hear about the following individuals, groups, or names: Yasser Arafat, Mahmoud Abbas, Ehud Barak, Ariel Sharon, Fatah, the Al-Aqsa Martyrs Brigades (AAMB), and Fatah. If you think you have heard of one (or more) of these individuals, groups or names, please indicate the individual, group, or name and how you have heard about the individual, group, or name.

43b. Do you believe that your knowledge or familiarity with any of the individuals, groups, or names listed above could affect your ability to be fair and impartial in this case?

☐ Yes ☐ No ☐ I don't know any of these individuals, groups, or names.

If yes, please explain:

44. Have you, a family member or a member of your household ever lived in or visited Israel, the West Bank, or the Gaza Strip?

☐ Yes ☐ No

If yes, where specifically (Israel, the West Bank, or the Gaza Strip) and when?

45. How knowledgeable do you consider yourself to be about what is sometimes referred to as "the Israeli-Palestinian conflict"?

☐ Not at all

☐ A little/somewhat

☐ A lot/very

Please explain:

45a. Do you believe that your knowledge of the "the Israeli-Palestinian conflict" could affect your ability to be fair and impartial in this case?

☐ Yes ☐ No ☐ I have no knowledge of "the Israeli-Palestinian conflict"

If yes, please explain:

46. Do you personally know anyone who was killed or injured in a shooting or bombing in Israel, the West Bank, or the Gaza Strip?

☐ Yes ☐ No

If yes, please describe your relationship to that person(s):

46a. Do you personally know anyone who was killed or injured in an alleged terrorist attack that did NOT occur in Israel, the West Bank, or the Gaza Strip?

☐ Yes ☐ No

If yes, please describe your relationship to that person(s):

46b. This case involves violent acts committed against civilians who died or were injured as a result of those acts. The allegation is that these were terrorist acts. Do you have such strong feelings about the nature of this case or terrorism in general that you might not be able to be fair and impartial in this case?

☐ Yes ☐ No

If yes, please explain:

47. Do you have any religious, philosophical, moral, political or other belief that might make you unable to render a fair and impartial verdict based solely on the law and evidence presented at this trial?

☐ Yes ☐ No

If yes, please explain:

48. Will you be able to follow the Judge's instructions that you will apply the law only as given to you by the Judge?

☐ Yes ☐ No

If no, please explain:

49. Is there anything about the nature of the case, or the questions that have been asked in this questionnaire, that causes you to doubt your ability to be a fair and impartial juror in this case?

☐ Yes ☐ No

If yes, please explain:

50. Is there any other matter that you should bring to the Court's attention that may have any bearing on your qualifications as a juror or may affect your ability to render a fair and impartial verdict based solely on the evidence and the Court's instructions on the law?

☐ Yes ☐ No

If yes, please explain:

51. Do you have an unusual financial hardship or other serious problem that would prevent you from serving as a juror for the duration of this case?

:

☐ Yes ☐ No

If yes, please explain briefly the nature of the hardship:

52. Do you have any difficulty speaking, reading or understanding English?

If yes, please explain:

☐ Yes ☐ No

53. Some of the testimony and documents may be translated from Hebrew and Arabic. Do you speak or read either language?

☐ Yes ☐ No

If yes, please explain:

54. Do you have any physical or medical problems that would interfere with your ability to serve?

If yes, please describe:

55. Is there any reason at all why you think you cannot serve on the jury?

☐ Yes ☐ No

This image shows a full page of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page, providing a template for writing. There are no margins, text, or other markings on the paper.

Additional Pages to Complete Responses to any Question

This image shows a full page of blank, lined paper. It features approximately 28 horizontal ruling lines spaced evenly across the page, typical of standard notebook paper. The lines are thin and black, set against a plain white background. There are no margins, text, or other markings on the page.